

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SEYED MOHSEN HOSSEINI-SEDEHY,

Plaintiff,

V.

ERIN T. WITHINGTON
and CITY OF BOSTON,

Defendants.

Civil Action No. 04-cv-11948-RGS

**PLAINTIFF'S RESPONSE TO THE SUFFOLK DISTRICT
ATTORNEY'S PRIVILEGE LOG**

Plaintiff Seyed Mohsen Hosseini-Sedehy (“Mr. Hosseini”) submits his response to the Suffolk District Attorney’s Privilege Log filed in support of the Suffolk District Attorney’s Office Motion to Quash the Subpoena. Mr. Hosseini does not seek the production of documents from the District Attorney withheld under the “privilege” described as “[c]umulative of information which plaintiff already possesses” with the exception of three documents: 1) Bates no. 440; 2) Bates no. 448; and, 3) Bates nos. 462-465. Mr. Hosseini states that he does not believe he has such documents in his possession. For the reasons stated in the Plaintiff’s Opposition to the Suffolk District Attorney’s Office Motion to Quash the Subpoena, Mr. Hosseini requests that the court deny the Suffolk District Attorney’s Office Motion to Quash the Subpoena.

Respectfully submitted,
Seyed Mohsen Hosseini-Sedehy
By his attorneys,

/s/ Gerard A. Butler, Jr.
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Dated: July 26, 2005

CERTIFICATE OF SERVICE

The undersigned certifies service of the foregoing on July 26, 2005, in accordance with Federal Rule of Civil Procedure 5(b)(2)(D) and United States District Court for the District of Massachusetts Electronic Case Filing Administrative Procedure § E(2) as all parties, having appeared in this action through counsel admitted to practice before this Court, have been identified by the Clerk as receiving Notice of Electronic Filing, and upon counsel for the moving party by first class mail postage prepaid as follows:

Eva M. Badway, Esq.
Office of Attorney General
One Ashburton Place
Boston, Massachusetts 02108-1698

/s/ Gerard A. Butler, Jr.
Gerard A. Butler, Jr. (BBO No. 557176)